

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:14-cv-00852-REP-
GBL-BMK

JOINT MOTION TO EXTEND THE DEADLINE TO FILE MOTIONS *IN LIMINE*

Plaintiffs, Defendants, and Intervenor-Defendants (collectively, the “Parties”) jointly request that this Court extend the deadline for filing motions *in limine* to June 9, 2015.

The Parties respectfully submit that there is good cause to grant this motion. Discovery in this matter was initially scheduled to close on May 22, 2015. *See* Dkt. No. 35. Discovery was then continued until May 28, 2015 to allow the Parties to take the deposition of Dr. Jonathan Katz, expert for the Intervenor-Defendants. *See* Dkt. No. 56. Subsequently, on May 26, 2015, this Court granted in part and denied in part Plaintiffs’ motion to compel production of certain documents in the possession of Intervenor-Defendants. *See* Dkt. No. 60. Under the terms of that Order, the Intervenor-Defendants must produce certain documents and materials on June 1 and 3, 2015. *See id.* Intervenor-Defendants are currently preparing for that production.

The current deadline for filing motions *in limine* is May 29, 2015. Under the original schedule, May 29 would have fallen one week after the close of discovery. *See* Dkt. No. 35. Under the current schedule, however, that date falls one day after the close of discovery and one day after the deposition of Dr. Katz. *See* Dkt. No. 56. Continuing the deadline for motions *in limine* to June 9, 2015 would give the Parties adequate time to prepare their motions in light of the full record, including Dr. Katz's deposition. Continuing the deadline would also allow the Parties to prepare their motions *in limine* in light of the additional documents due to be produced by Intervenor-Defendants on June 1 and 3.

For the foregoing reasons, the Parties respectfully request that this Court extend the deadline for filing motions *in limine* from May 29, 2015 until June 9, 2015.

Pursuant to this Court's ECF Policies and Procedures, a consent order reflecting this proposed modification will be filed with the clerk's office.

Respectfully submitted,

By: /s/ Anthony F. Troy
Anthony F. Troy (VSB No. 05985)
ECKERT SEAMANS CHERIN &
MELLOTT, LLC
SunTrust Center
919 East Main Street
Suite 1300
Richmond, VA 23219
Tel: (804) 788-7740
atroy@eckertseamans.com

Attorneys for Defendants

By: /s/ John K. Roche
John K. Roche (VSB No. 68594)
PERKINS COIE, LLP
700 13th St. N.W., Suite 600
Washington, D.C. 20005-3960
Tel: (202) 434-1627
JRoche@perkinscoie.com

Attorneys for Plaintiffs

By: /s/ Jennifer M. Walrath
Jennifer M. Walrath (VSB No. 75548)
Katherine L. McKnight (VSB No. 81482)
BAKER & HOSTETLER LLP
1050 Connecticut Ave NW, Suite 1100
Washington, DC 20036
Tel: (202) 861-1500
jwalrath@bakerlaw.com
kmcknight@bakerlaw.com

Attorneys for Intervenor-Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2015, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jeffrey P. Brundage
Daniel Ari Glass
Kathleen Angell Gallagher
Eckert Seamans Cherin & Mellott LLC
1717 Pennsylvania Ave NW
Suite 1200
Washington, D.C. 20006
Tel: (202) 659-6600
Fax: (202) 659-6699
jbrundage@eckertseamans.com
dglass@eckertseamans.com
kgallagher@eckertseamans.com

Anthony F. Troy
Eckert Seamans Cherin & Mellott LLC
SunTrust Center
919 East Main Street
Suite 1300
Richmond, VA 23219
Tel: (804) 788-7751
Fax: (804) 698-2950
ttroy@eckertseamans.com

Attorneys for Defendants

Jennifer Marie Walrath
Katherine Lea McKnight
Baker & Hostetler LLP (DC)
1050 Connecticut Ave NW
Suite 1100
Washington, DC 20036
Tel: (202) 861-1702
Fax: (202) 861-1783
jwalrath@bakerlaw.com
kmcknight@bakerlaw.com

Efrem Mark Braden
Baker & Hostetler LLP (DC-NA)
Washington Square
Suite 1100
Washington, DC 20036
Tel: (202) 861-1504
Fax: (202) 861-1783
mbraden@bakerlaw.com

Attorneys for Intervenor-Defendants

By /s/ John K. Roche

John K. Roche (VSB No. 68594)

Perkins Coie LLP

700 13th St., N.W., Suite 600

Washington, D.C. 20005-3960

Tel: (202) 434-1627

Fax: (202) 654-9106

JRoche@perkinscoie.com

Attorneys for Plaintiffs